Commonwealth of Kentucky Division for Air Quality

PERMIT APPLICATION SUMMARY FORM

Completed by: Diana Robertson

GENERAL INFORMATION:	
Name:	Lingo Manufacturing, Inc.
Address:	7400 Industrial Road
	Florence, KY 41042
Date application received:	1/30/09
SIC Code/SIC description:	2542, Office and Store Fixtures, Partitions,
•	Shelving, and Lockers, Except Wood (lunchroom
	tables and chairs)
Source ID:	21-015-00011
Agency Interest:	209
Activity:	APE20090001
Permit:	F-08-001 R1
A DDI 10 A TROM TYPE /DEDMIT A CTIMITY	
<u>APPLICATION TYPE/PERMIT ACTIVITY</u> [] Initial issuance	
[x] Permit modification	[] General permit
Administrative	[x] Conditional major[] Title V
Administrative X Minor	
	[x] Synthetic minor
Significant [] Permit renewal	[] Operating [x] Construction/operating
[] Fermit Tenewai	[x] Construction/operating
COMPLIANCE SUMMARY:	
[] Source is out of compliance	ce [] Compliance schedule included
[] Compliance certification s	igned
APPLICABLE REQUIREMENTS LIST:	
[] NSR	[x] NSPS [] SIP
[] PSD	NESHAPS [] Other
	[] Not major modification per 401 KAR 51:001, 1(116)(b)
N/	
MISCELLANEOUS:	
[] Acid rain source	
[] Source subject to 112(r)	
[x] Source applied for federal	· ·
<u> </u>	alternative operating scenarios
[] Source subject to a MACT	
<u> -</u>	case 112(g) or (j) determination
[] Application proposes new	
[] Certified by responsible of	
[x] Diagrams or drawings incl	
	rmation (CBI) submitted in application
[] Pollution Prevention Meas	
[x] Area is non-attainment (lis	st pollutants): ozone

EMISSIONS SUMMARY FOR (F-08-001):

<u>Pollutant</u>	Actual (tpy)*	Allowable (tpy)	Potential (tpy)
PM/PM_{10}	0.015		34.20**
SO_2	0.0007		0.01
NO _x	0.12		1.10
СО	0.01		0.92
VOCs	7.48	<20	681.00
Ethylbenzene	0.005	<9	34.18
Methyl isobutyl ketone	0.01	<9	82.74
Xylene	0.39	<9	149.01
Cumene	0.37		4.65
Total HAPs	0.78	<20	270.58

^{*} Actual emissions are from the Kentucky Division for Air Quality's 2008 Emissions Inventory Report

EMISSIONS POTENTIAL FOR ADDITION OF MANUAL SPRAY PAINT BOOTH (F-08-001 R1)

<u>Pollutant</u>	Actual (tpy)	Allowable (tpy)	Potential (tpy)
PM/PM_{10}			1.17**
VOC's	<20	<20	45.83

^{**} Potential controlled emissions

TOTAL EMISSION SUMMARY (F-08-001 R1)

<u>Pollutant</u>	Actual (tpy)*	Allowable (tpy)	Potential (tpy)
PM/PM_{10}			35.37**
SO_2	0.0007		0.01
NO_x	0.12		1.10
СО	0.01		0.92

^{**} Potential controlled emissions

VOCs	<20	<20	726.82
Ethylbenzene	0.005	<9	34.18
Methyl isobutyl ketone	0.01	<9	82.74
Xylene	0.39	<9	149.01
Cumene	0.37		4.65
Total HAPs	0.78	<20	270.58

^{*} Actual emissions are from the Kentucky Division for Air Quality's 2008 Emissions Inventory Report

MINOR PERMIT REVISION: F-08-001 R1

On January 30, 2009, the Division received an application from Lingo Manufacturing for a minor revision to their conditional major permit F-08-001 for the installation of a new manual spray paint booth to their facility. The spray booth consists of an air-assisted manual spray gun. Series SPRAGARD High Efficiency Paint Arrestors are utilized to control particulate emissions. The estimated control efficiency of the filters is 92%.

The facility will continue to operate under their source-wide limit VOC emissions of twenty (20) tons per year to preclude the applicability of 401KAR 59:225, New miscellaneous metal parts and products surface coating operations. They will also continue to operate under their source-wide emission limits for HAPS to preclude the applicability of 401KAR 52:020, Title V Permit and the Subpart MMMM—National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. Individual HAP emissions shall be less than or equal to 9 tons per rolling 12-month period and combined HAPs emissions shall be less than or equal to 20 tons per rolling 12-month period.

SOURCE DESCRIPTION:

Lingo Manufacturing Company, located in Boone County manufactures custom specialty metal shelving for display products. The process consists of two automatic spray booths, one manual spray booth, one baking oven and welding machines. Boone County is classified as a non-attainment area for Ozone.

COMMENTS:

A permit application from Lingo Manufacturing Company was received by the Permit Review Branch on November 5, 2007. Lingo has applied to the Division to renew their Conditional Major permit (F-03-005).

VOC emissions:

Lingo is potentially a major source for VOC emissions. No control equipment is utilized for VOC emissions. The current Conditional Major permit (F-03-005) was issued on February 6, 2003 with a source wide emission limitation for VOCs of ninety (95) tons per year to preclude the applicability of 401 KAR 52:020, Title V Permits. Furthermore, the facility has opted to limit their source wide VOC emissions to twenty (20) tons per year to preclude the applicability of 401KAR

^{**} Potential controlled emissions

59:225, New miscellaneous metal parts and products surface coating operations per Section 6(c)(3) of this regulation. Lingo's actual VOC emission for the year 2006 was 6.1 tons. A surge of VOC emission is not expected in the near future.

HAP emissions:

Lingo is potentially a major source for HAP emissions. No control equipment is utilized for HAP emissions. The source has voluntarily accepted the following emission limits for HAPs to preclude the applicability of 401KAR 52:020, Title V Permit and the Subpart MMMM—National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products:

- Individual HAP emissions shall be less than or equal to 9 tons per rolling 12-month period.
- Combined HAPs emissions shall be less than or equal to 20 tons per rolling 12-month period.

PM emissions:

The coating spray booths are equipped with two layers of exhaust filters to control particulate emissions. The estimated control efficiency for these filters is 92%. The controlled PM/PM₁₀ emissions will remain below 401 KAR 59:010 allowable.

No control equipment is utilized for resistance welding machine line. The potential to emit PM/PM_{10} is below KAR 59:010 allowable.

Applicable Regulations:

401 KAR 59:010, New process operations is applicable to the each facility (EP01, EP02, EP 03 and EP 04) for particulate emissions.

40 CFR 60, Subpart EE, Standards of Performance for Surface Coating of Metal Furniture is applicable to each metal furniture surface coating operation (EP 02, EP 03 and EP 04) in which organic coatings are applied. The emission of VOCs shall not exceed 0.90 kilogram per liter (7.51 pounds of VOC per gallon) of coating solids applied (volume-weighted calendar month average).

Non applicable Regulations:

401 KAR 59:225, New miscellaneous metal parts and products surface coating operations is not applicable to Lingo because the source accepted a source wide emission cap for VOCs emission less than or equal to twenty tons per year per Section 6(c)(3) of this regulation.

Subpart MMMM—National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products is not applicable to Lingo because the source accepted source-wide HAP emission limits for single HAP 9 tons and for combined HAPs 20 tons per year to maintain a non-major source status.

PERIODIC MONITORING:

Compliance with annual emissions caps will be ensured by monitoring, record keeping and reporting specified in the permit. The Division is requiring the source to keep monthly records of usage of paintings and solvents at each of the spray booths. The source shall also keep records of the monthly and the twelve months rolling total for VOC and HAP emissions.

The Division is requiring the source to maintain a log of the pressure drop readings across the

particulate filters, including the time, date, identity of the personnel making the record, and the dates of filters replacements.